

FILED

AUG 20 2020

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF ILLINOIS
EAST ST. LOUIS OFFICE

UNITED STATES OF AMERICA,

Plaintiff,

v.

CAMERON J. BLAKE,

Defendants.

Criminal No.

20-30123-NJR

Title 18, United States Code,

Sections 1951(a) and 924(c)(1)(A)

INDICTMENT

THE GRAND JURY CHARGES:

COUNT 1

INTERFERENCE WITH COMMERCE BY ROBBERY

On or about December 2, 2019, in St. Clair County, within the Southern District of Illinois,

CAMERON J. BLAKE,

defendant herein, did commit robbery, which robbery did obstruct, delay and affect commerce and the movement of articles and commodities in such commerce, in that:

(1) BLAKE, did take and obtain, and attempt to take and obtain, United States currency, which was the proceeds of ZX Gas Station, located at 2400 North Illinois Street, business activities, from the person and presence of employees of ZX Gas Station, against their will by means of actual and threatened force, violence and fear of injury to their person by brandishing a firearm.

(2) At all times material to this Indictment, ZX Gas Station was engaged in the retail sale of food, beverages, tobacco products, and gasoline, in interstate commerce and an industry, which affects interstate commerce.

All in violation of Title 18, United States Code, Sections 1951.

COUNT 2

CARRY AND USE OF A FIREARM DURING A CRIME OF VIOLENCE

On or about December 2, 2019, in St. Clair County, within the Southern District of Illinois,

CAMERON J. BLAKE,

defendant herein, did knowingly use, carry and brandish a firearm during and in relation to, and did knowingly possess in furtherance of, a crime of violence for which they may be prosecuted in a court of the United States, that is: Interference with Commerce by Robbery as named and fully described in Count 1 of this Indictment, in violation of Title 18, United States Code, Sections 924(c)(1)(A)(iii).

COUNT 3

INTERFERENCE WITH COMMERCE BY ROBBERY

On or about December 2, 2019, in St. Clair County, within the Southern District of Illinois,

CAMERON J. BLAKE,

defendant herein, did commit robbery, which robbery did obstruct, delay and affect commerce and the movement of articles and commodities in such commerce, in that:

(1) BLAKE, did take and obtain, and attempt to take and obtain, United States currency, which was the proceeds of Huck's Food and Fuel business activities, from the person and presence of employees of Huck's Food and Fuel, against their will by means of actual and threatened force, violence and fear of injury to their person by brandishing a firearm.

(2) At all times material to this Indictment, Huck's Food and Fuel was engaged in the retail sale of food, beverages, tobacco products, and gasoline, in interstate commerce and an industry, which affects interstate commerce.

All in violation of Title 18, United States Code, Sections 1951.

COUNT 4

CARRY AND USE OF A FIREARM DURING A CRIME OF VIOLENCE

On or about December 2, 2019, in St. Clair County, within the Southern District of Illinois,

CAMERON J. BLAKE,

defendant herein, did knowingly use, carry and brandish a firearm during and in relation to, and did knowingly possess in furtherance of, a crime of violence for which they may be prosecuted in a court of the United States, that is: Interference with Commerce by Robbery as named and fully described in Count 3 of this Indictment, in violation of Title 18, United States Code, Sections 924(c)(1)(A)(iii).

COUNT 5

INTERFERENCE WITH COMMERCE BY ROBBERY

On or about December 2, 2019, in St. Clair County, within the Southern District of Illinois,

CAMERON J. BLAKE,

defendant herein, did commit robbery, which robbery did obstruct, delay and affect commerce and the movement of articles and commodities in such commerce, in that:

(1) BLAKE, did take and obtain, and attempt to take and obtain, United States currency, which was the proceeds of ZX Gas Station, located at 420 Carlyle Avenue, business activities, from the person and presence of employees of ZX Gas Station, against their will by means of actual and threatened force, violence and fear of injury to their person by brandishing a firearm.

(2) At all times material to this Indictment, ZX Gas Station was engaged in the retail sale of food, beverages, tobacco products, and gasoline, in interstate commerce and an industry, which affects interstate commerce.

All in violation of Title 18, United States Code, Sections 1951.

COUNT 6

CARRY AND USE OF A FIREARM DURING A CRIME OF VIOLENCE

On or about December 2, 2019, in St. Clair County, within the Southern District of Illinois,

CAMERON J. BLAKE,

defendant herein, did knowingly use, carry and brandish a firearm during and in relation to, and did knowingly possess in furtherance of, a crime of violence for which they may be prosecuted in a court of the United States, that is: Interference with Commerce by Robbery as named and fully described in Count 5 of this Indictment, in violation of Title 18, United States Code, Sections 924(c)(1)(A)(iii).

COUNT 7

INTERFERENCE WITH COMMERCE BY ROBBERY

On or about December 27, 2019, in St. Clair County, within the Southern District of Illinois,

CAMERON J. BLAKE,

defendant herein, did commit robbery, which robbery did obstruct, delay and affect commerce and the movement of articles and commodities in such commerce, in that:

(1) BLAKE, did take and obtain, and attempt to take and obtain, United States currency, which was the proceeds of Domino's Pizza business activities, from the person and presence of employees of Domino's Pizza, against their will by means of actual and threatened force, violence and fear of injury to their person by brandishing a firearm.

(2) At all times material to this Indictment, Domino's Pizza was engaged in the retail sale of food and beverages, in interstate commerce and an industry, which affects interstate commerce.

All in violation of Title 18, United States Code, Sections 1951.

COUNT 8

CARRY AND USE OF A FIREARM DURING A CRIME OF VIOLENCE

On or about December 2, 2019, in St. Clair County, within the Southern District of Illinois,

CAMERON J. BLAKE,

defendant herein, did knowingly use, carry and brandish a firearm during and in relation to, and did knowingly possess in furtherance of, a crime of violence for which they may be prosecuted in a court of the United States, that is: Interference with Commerce by Robbery as named and fully described in Count 7 of this Indictment, in violation of Title 18, United States Code, Sections 924(c)(1)(A)(iii).

FORFEITURE ALLEGATION

Upon conviction of the offense alleged in Counts 1-8 of this indictment,

CAMERON J. BLAKE,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), any property constituting, or derived from, any proceeds said defendants obtained, directly or indirectly, as the result of such violation and any property of the defendants used, or intended to be used, in any manner or part, to commit or to facilitate the commission of said offense, and all firearms and ammunition involved in or used in any knowing violation of the offense described in this Indictment, including, but not limited, to the following: Heckler Koch VP9, 9mm semi-automatic handgun, and any and all ammunition contained therein or within seized firearm.




STEVEN D. WEINHOEFT
United States Attorney



ALEXANDRIA M. BURNS
Assistant United States Attorney